

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 24, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**
WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 14-58, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, South Plains Telephone Cooperative, Inc. (“SPTC” or “the Cooperative”), Study Area Code 442143, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission’s rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the

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financial annual report is being made pursuant to the FCC's June 17, 2015 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that SPTC maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, SPTC requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative keeps confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Cooperative's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Cooperative's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to

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improve service quality, service coverage, and/or service capacity. It also contains a map of the Cooperative's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

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- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Cooperative's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). SPTC seeks confidential treatment of its financial annual report pursuant to the June 17, 2015 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

SPTC is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

¹ Connect America Fund *et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 (rel. Jun. 17, 2015).

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Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,



Stuart Polikoff
Authorized Representative for
South Plains Telephone Cooperative, Inc.

SP/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Mr. Scotty Hart, South Plains Telephone Cooperative, Inc.

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	442143
<015> Study Area Name	SOUTH PLAINS TEL
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Karen Keel
<035> Contact Telephone Number: Number of the person identified in data line <030>	8067632301 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	sptckkeel@sptc.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <small>check box if no outages to report</small>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)		(attach descriptive document)	
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)		(attach descriptive document)	
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)			
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance		(check to indicate certification)	
442143tx510.pdf		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>		(attached descriptive document)	
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations		(check to indicate certification)	
442143tx610.pdf		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>		(attached descriptive document)	
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)		(complete attached worksheet)	
<710> Company Price Offerings (broadband)		(complete attached worksheet)	
<800> Operating Companies and Affiliates		(complete attached worksheet)	
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	(If yes, complete attached worksheet)	
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	
442143tx1010.pdf		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>		(attach descriptive document)	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	
<1110>		(complete attached worksheet)	
<1200> Terms and Condition for Lifeline Customers		(complete attached worksheet)	
Price Cap Carriers, Proceed to <u>Price Cap Additional Documentation Worksheet</u>			
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>		(check to indicate certification)	
<2005>		(complete attached worksheet)	
Rate of Return Carriers, Proceed to <u>ROR Additional Documentation Worksheet</u>			
<3000>		(check to indicate certification)	
<3005>		(complete attached worksheet)	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>		(check to indicate certification)	
<2005>		(complete attached worksheet)	

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)	
<3005>		(complete attached worksheet)	

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Kee1
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckkee1@sptc.c.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
<110>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

442143tx112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- | | | |
|-------|--|----------------|
| <113> | Maps detailing progress towards meeting plan targets | Yes |
| <114> | Report how much universal service (USF) support was received | Yes |
| <115> | How much (USF) was used to improve service quality and how support was used to improve service quality | Yes |
| <116> | How much (USF) was used to improve service coverage and how support was used to improve service coverage | Yes |
| <117> | How much (USF) was used to improve service capacity and how support was used to improve service capacity | Yes |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year. | Not Applicable |

(200) Service Outage Reporting (Voice) Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481
OIMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Kee 1
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptcckee1@sptc.n
<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control
JULY 2013

**(800) Operating Companies
Data Collection Form**

FCC Form 481
OMB Control No.
July 2013

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Kee1
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	spckkree1@spc.c.net

<910> Tribal Land(s) on which ETC Serves

[Large rectangular redacted area]

[Medium rectangular redacted area]

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select	
Yes or No	
Not Applicable	

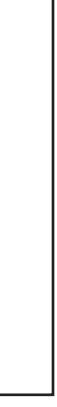
- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckee1@sptc.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).


<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).


**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632201 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckee1@sptc.net
		442143tx1210.pdf
<1210> Terms & Conditions of Voice Telephony Lifeline Plans		Name of Attached Document

- HTTP
- “Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:
- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLATINUM TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Kee
<035>	Contact Telephone Number - Number of person identified in data line <030>	8057622301 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptcokke1@sptc.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1ii)}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1iii)}
- <2011b> Attachment {47 CFR § 54.313(b)(1ii)}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313(e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community/Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Kee
<031>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext.
<032>	Contact Email Address - Email Address of person identified in data line <030>	spckleek@spcic.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification [47 CFR § 54.313(f)(1)(ii)]

Name of Attached Document Listing Required Information

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to
(3011) § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began
providing access to broadband service in the preceding calendar year.

442143t-x3012.pdf

(3012) **Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]**

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)]
(3014) If yes, does your company file the RUS annual report

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for
Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

442143t-x3017.pdf

Name of Attached Document Listing Required Information
(Yes/No)

(3017) If the response is yes on line 3014, attach your company's RUS annual
report and all required documentation

Name of Attached Document Listing Required Information
(Yes/No)

(3018) If the response is no on line 3014, Is your company audited?

If the response is yes on line 3018, please check the boxes below to
confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report, in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit
If the response is no on line 3018, please check the boxes below
to confirm your submission, on line 3026 pursuant to § 54.313(f)(2).

(3022) Copy of their financial statement, which has been subject to review by an
independent certified public accountant; or (2) a financial report in a
format comparable to RUS Operating Report for Telecommunications
Borrowers,

(3023) Underlying information subjected to a review by an independent certified
public accountant
Underlying information subjected to an officer certification.
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)
Data Collection Form

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code 442143
<015> Study Area Name SOUTH PLAINS TEL
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data Karen Kee
<031> Contact Telephone Number - Number of person identified in data line <030> 8067632301 ext.
<032> Contact Email Address - Email Address of person identified in data line <030> spckklee@spc.c.net
<033>

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



**Certification - Reporting Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	442143
<015> Study Area Name	SOUTH PLAINS TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Karen Keel
<035> Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	ext.
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	442143
<015> Study Area Name	SOUTH PLAINS TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Karen Keel
<035> Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Stuart Polikoff</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Stuart Polikoff</u>
Name of Reporting Carrier:	<u>SOUTH PLAINS TEL</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u>
Printed name of Authorized Officer:	<u>Scotty Hart</u>
Title or position of Authorized Officer:	<u>CEO / General Manager</u>
Telephone number of Authorized Officer:	<u>8067632301 ext.</u>
Study Area Code of Reporting Carrier:	<u>442143</u>
Filing Due Date for this form: <u>07/01/2015</u>	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>SOUTH PLAINS TEL</u>
Name of Authorized Agent or Employee of Agent:	<u>Stuart Polikoff</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Stuart Polikoff</u>
Title or position of Authorized Agent or Employee of Agent	<u>Telecommunications Consulting Director</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5126527730 ext.</u>
Study Area Code of Reporting Carrier:	<u>442143</u>
Filing Due Date for this form: <u>07/01/2015</u>	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 48
OMB Control
July 2013

<010>	Study Area Code	442143
<015>	Study Area Name	SOUTH PLAINS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel
<035>	Contact Telephone Number - Number of person identified in data line <030>	8067632301 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143							
<015>	Study Area Name	SOUTH PLAINS TEL							
<020>	Program Year	2016							
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel							
<035>	Contact Telephone Number - Number of person identified in data line <030>	3067632301 ext.							
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net							
<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance	Action Taken When Limit Reached {select}
TX	All	35.0	0.0	35.0	5.0	1.0	999999	Other, No limit on usage allowance.	
TX	All	40.0	0.0	40.0	10.0	1.0	999999	Other, No limit on usage allowance.	
TX	All	45.0	0.0	45.0	15.0	1.0	999999	Other, No limit on usage allowance.	
TX	Acuff	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Arnett	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Caprock	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Cone	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Cotton Center	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	County Line	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Edmonson	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Fieldton	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Halfway	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Happy Union	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Hollandville	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	McAdoo	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Merrell	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Pettit	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Woodrow	39.0	0.0	39.0	5.0	2.0	999999	Other, No limit on usage allowance.	
TX	Acuff	44.0	0.0	44.0	10.0	2.0	999999	Other, No limit on usage allowance.	
TX	Arnett	44.0	0.0	44.0	10.0	2.0	999999	Other, No limit on usage allowance.	
TX	Caprock	44.0	0.0	44.0	10.0	2.0	999999	Other, No limit on usage allowance.	

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143							
<015>	Study Area Name	SOUTH PLAINS TEL							
<020>	Program Year	2016							
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel							
<035>	Contact Telephone Number - Number of person identified in data line <030>	9067632301 ext.							
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net							
<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance	Action Taken When Limit Reached {select}
TX	Cone	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Cotton Center	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	County Line	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Edmonson	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Fieldton	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Halfway	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Happy Union	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Hollandville	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	McAdoo	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Merrill	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Petit	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Woodrow	44 .0	0 .0	44 .0	10 .0	2 .0	999999	Other, No limit on usage allowance.	
TX	Acuff	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Arnett	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Caprock	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Cone	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Cotton Center	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	County Line	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Edmonson	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Fieldton	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	
TX	Halfway	53 .0	0 .0	53 .0	15 .0	3 .0	999999	Other, No limit on usage allowance.	

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442143							
<015>	Study Area Name	SOUTH PLAINS TEL							
<020>	Program Year	2016							
<030>	Contact Name - Person USAC should contact regarding this data	Karen Keel							
<035>	Contact Telephone Number - Number of person identified in data line <030>	9067632301 ext.							
<039>	Contact Email Address - Email Address of person identified in data line <030>	sptckkeel@sptc.net							
<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance	Action Taken When Limit Reached {select}
TX	Happy Union	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	Hollandville	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	McAdoo	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	Merrill	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	Pettit	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	Woodrow	53.0	0.0	53.0	15.0	3.0	999999	Other, No limit on usage allowance.	
TX	Acuff	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Arnett	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Caprock	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Cone	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Cotton Center	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	County Line	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Edmonson	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Fieldton	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Halfway	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Happy Union	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Hollandville	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	McAdoo	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Merrill	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Pettit	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	
TX	Woodrow	75.0	0.0	75.0	20.0	5.0	999999	Other, No limit on usage allowance.	

**LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN
PROGRESS REPORT**

The Cooperative received \$965,357 in Universal Service Fund (“USF”) support during the period January through April 2015. It projects that it will receive \$488,230 in USF support during the period May-June 2015. The Cooperative therefore projects that its total USF support for the first half of 2015 (Jan.-Jun.) will be \$1,453,587.

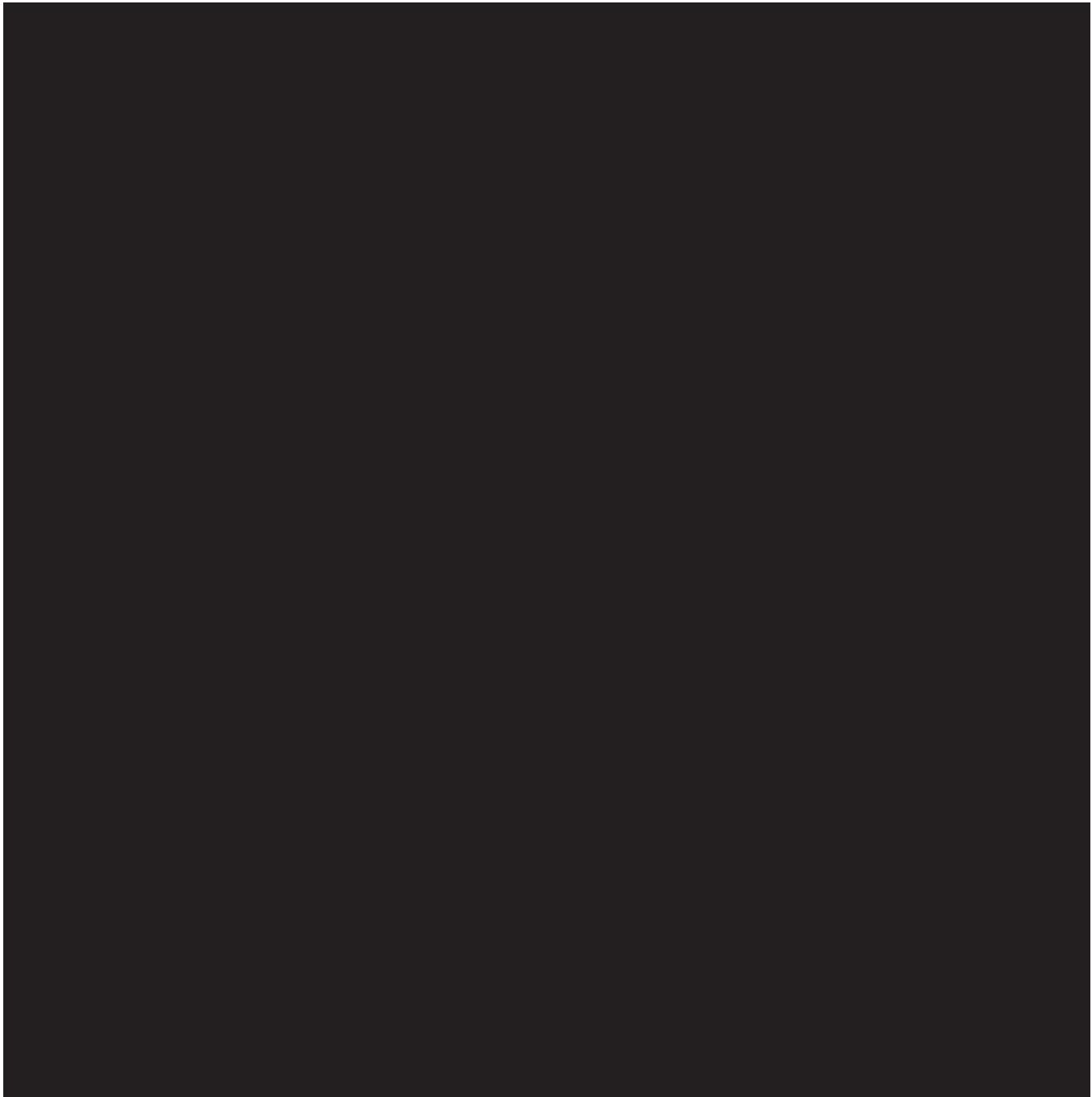
Service Quality Improvement Plan Progress Report

Exchange	5 Year Plan 2015 Proposed Improvements	5 Year Plan - 2015 Forecast	2015 Progress (Jan-June)
	GRAND TOTAL	[REDACTED]	[REDACTED]

2015 Progress Report Description



REDACTED - FOR PUBLIC INSPECTION



REDACTED - FOR PUBLIC INSPECTION



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

South Plains Telephone Cooperative, Inc. (the “Cooperative”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Cooperative operates are outlined in its member services tariff, which is approved by the Public Utility Commission of Texas (“Texas PUC”). The tariff contains provisions regarding the Cooperative’s customer service and protection practices.

Service quality standards for voice service are established by the Texas PUC. The Cooperative consistently meets or exceeds those standards and provides reports to the Texas PUC, in accordance with the Texas PUC’s rules.

With regard to broadband service, the Cooperative provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a “best effort” service and are dependent upon a number of variables, many of which are outside the control of the Cooperative.

The Cooperative complies with any and all consumer protection obligations under state law.

The Cooperative also complies with the following consumer best practices: (1) the Cooperative discloses its rates and terms of service to customers; (2) the Cooperative provides specific disclosures in its advertising; (3) the Cooperative separately identifies carrier charges from taxes on its billing statements; (4) the Cooperative provides ready access to customer service; (5) the Cooperative promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Cooperative abides by policies for protection of consumer privacy.

Finally, the Cooperative has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Cooperative’s compliance with CPNI rules and a description of the Cooperative’s operating procedures that ensure compliance are filed annually with the FCC.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

South Plains Telephone Cooperative, Inc. (the “Cooperative”) is able to function in emergency situations for both voice and broadband service. The Cooperative has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, and mobile generators are at strategic locations to be deployed as needed to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Cooperative is able to reroute traffic around damaged facilities. Although the Cooperative’s ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 1010 – VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau’s most recent reasonable comparability benchmark for voice services is \$47.48, which includes the federal subscriber line charge (“SLC”).¹

In all of the exchanges served by South Plains Telephone Cooperative, Inc. (“the Cooperative”), the single-line residential local rate, including any mandatory extended area service charge, is \$15.65. When the federal SLC (\$6.50) and the state universal service fee (\$.58) are included, the rate becomes \$22.73. Therefore, the Cooperative’s pricing of fixed voice services is less than the reasonable comparability benchmark of \$47.48.

¹ *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

Residential customers of South Plains Telephone Cooperative, Inc. (“the Cooperative”) who qualify for the Lifeline Program receive a discount of either \$13.13 (\$9.25 federal discount + \$3.50 state discount + \$.38 area discount) or \$13.45 (\$9.25 federal discount + \$3.50 state discount + \$.70 area discount) on local voice telephony service, depending upon the exchange.

In all but one of the Cooperative’s exchanges, the Lifeline single-line residential rate, including any mandatory extended area service charge and the federal subscriber line charge (“SLC”), is \$9.02 (\$22.15 standard rate - \$13.13 discount). This rate applies to the following exchanges: Pettit, Fieldton, Arnett, Hollandville, Caprock, Cone, McAdoo, County Line, Acuff, Woodrow, Edmonson, Merrell, Cotton Center, Halfway, Happy Union.

In the Cooperative’s Ransom Canyon exchange, the Lifeline single-line residential rate, including the federal SLC, is \$8.70 (\$19.35 standard rate - \$13.45 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within their local calling area.

Toll charges for calls outside of the local calling area are determined by the long distance carrier of the customer’s choosing. Customers may elect to subscribe to toll blocking at no charge.

The Cooperative does not disconnect the service of Lifeline subscribers for the non-payment of toll charges. However, the Cooperative reserves the right to implement toll blocking, at no charge, if the customer incurs a significant balance of unpaid toll bills.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services, where available, at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at <http://www.sptc.net/02/regulatory.html>.

LINE 3010 – MILESTONE CERTIFICATION

South Plains Telephone Cooperative, Inc. (the “Cooperative”) hereby certifies that the Cooperative has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

LINE 3012 – COMMUNITY ANCHOR INSTITUTIONS

South Plains Telephone Cooperative, Inc. did not newly deploy broadband service to any community anchor institutions in the preceding calendar year (2014).

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

BORROWER NAME

South Plains Telephone Cooperative, Inc.

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period.
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING
December, 2014

BORROWER DESIGNATION
TX0517

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII
(Check one of the following)

All of the obligations under the RUS loan documents have been fulfilled in all material respects.

There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Scotty Hart

3/20/2015

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS <small>INSTRUCTIONS- See RUS Bulletin 1744-2</small>	BORROWER DESIGNATION TX0517 PERIOD ENDING December, 2014
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PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues		
2. Network Access Services Revenues		
3. Long Distance Network Services Revenues		
4. Carrier Billing and Collection Revenues		
5. Miscellaneous Revenues		
6. Uncollectible Revenues		
7. Net Operating Revenues (1 thru 5 less 6)		
8. Plant Specific Operations Expense		
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
10. Depreciation Expense		
11. Amortization Expense		
12. Customer Operations Expense		
13. Corporate Operations Expense		
14. Total Operating Expenses (8 thru 13)		
15. Operating Income or Margins (7 less 14)		
16. Other Operating Income and Expenses		
17. State and Local Taxes		
18. Federal Income Taxes		
19. Other Taxes		
20. Total Operating Taxes (17+18+19)		
21. Net Operating Income or Margins (15+16-20)		
22. Interest on Funded Debt		
23. Interest Expense - Capital Leases		
24. Other Interest Expense		
25. Allowance for Funds Used During Construction		
26. Total Fixed Charges (22+23+24-25)		
27. Nonoperating Net Income		
28. Extraordinary Items		
29. Jurisdictional Differences		
30. Nonregulated Net Income		
31. Total Net Income or Margins (21+27+28+29+30-26)		
32. Total Taxes Based on Income		
33. Retained Earnings or Margins Beginning-of-Year		
34. Miscellaneous Credits Year-to-Date		
35. Dividends Declared (Common)		
36. Dividends Declared (Preferred)		
37. Other Debits Year-to-Date		
38. Transfers to Patronage Capital		
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]		
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital		
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)		
44. Annual Debt Service Payments		
45. Cash Ratio [(14+20-10-11) / 7]		
46. Operating Accrual Ratio [(14+20+26) / 7]		
47. TIER [(31+26) / 26]		
48. DSCR [(31+26+10+11) / 44]		

<p>USDA-RUS</p> <p>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</p> <p><i>INSTRUCTIONS - See RUS Bulletin 1744-2</i></p>	<p>BORROWER DESIGNATION TX0517</p> <p>PERIOD ENDED December, 2014</p>
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Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Pettit							
Fieldton							
Arnett							
Hollandville							
Caprock							
Cone							
McAdoo							
County Line							
Ransom Canyon							
Acuff							
Woodrow							
Edmonson							
Merrell							
Cotton Center							
Halfway							
Happy Union							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

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PART D. SYSTEM DATA

1. No. Plant Employees	<input type="text"/>	2. No. Other Employees	<input type="text"/>	3. Square Miles Served	<input type="text"/>	4. Access Lines per Square Mile	<input type="text"/>	5. Subscribers per Route Mile	<input type="text"/>
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PART E. TOLL DATA

1. Study Area ID Code(s) a. <u>809154</u> b. c. d. e. f. g. h. i. j.	2. Types of Toll Settlements (Check one)		
	Interstate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis
	Intrastate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis

PART F. FUNDS INVESTED IN PLANT DURING YEAR

1. RUS, RTB, & FFB Loan Funds Expended	
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	<input type="text"/>
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	<input type="text"/>

PART G. INVESTMENTS IN AFFILIATED COMPANIES

INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year (b)	Income/Loss This Year (c)	Cumulative Investment To Date (d)	Cumulative Income/Loss To Date (e)	Current Balance (f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

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PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority
with jurisdiction over the provision of telephone services? (Check one)

YES

NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS INSTRUCTIONS – See help in the online application.	BORROWER DESIGNATION TX0517 PERIOD ENDED December, 2014
PART I – STATEMENT OF CASH FLOWS	
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
CASH FLOWS FROM OPERATING ACTIVITIES	
2. Net Income	
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>	
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain) Gain On Plant Retirements, and excise tax refund	
<i>Changes in Operating Assets and Liabilities</i>	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain) Prior Period Adjustment	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain) Original Cost of Plant Retired and Net Salvage	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	

Revision Date 2010

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NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

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CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	